

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK.

RAHUL MANCHANDA,

Plaintiff,

No. 18 Civ. 11092 (PGG)

— against —

STIPULATION OF
DISMISSAL WITH
PREJUDICE

NICOLE MATTIES, NICOLA SHAPIRO, DOUGLAS
SENDEROFF, ROGER BLANK, AARON MINC,
DANIEL POWELL, MATT O'BUCK, SHARIE O'BUCK,
KATE BOSE, NEW YORK FBI, NYPD, JOE HENDRIX,
ANDRE DE CASTRO, JAMIE WOZMAN, MARK
ANESH, COREY COHEN, A. MICHAEL FURMAN, and
PAULA ASHCRAFT,

Defendants.

WHEREAS, on or about October 14, 2018, Plaintiff Rahul Manchanda ("Plaintiff") filed a complaint in the Supreme Court of New York, County of New York, Index No. 101501/2018 ("NYS Supreme Court Action"), naming Nicole Matties, Nicola Shapiro, Douglas Senderoff, Roger Blank, Aaron Minc, Daniel Powell, Matt O'Buck, and Sharie O'Buck as defendants;

WHEREAS, on or about October 24, 2018, Plaintiff filed a second amended complaint in NYS Supreme Court Action, adding the Federal Bureau of Investigation (improperly named as NY FBI) (the "FBI") and the NYPD as defendants;

WHEREAS, on or about October 31, 2018, Plaintiff filed a third amended complaint in the NYS Supreme Court Action, adding Joe Hendrix and Andre de Castro as defendants (the "Third Amended Complaint");

WHEREAS, on or about November 28, 2018, the FBI removed the Third Amended Complaint to the Southern District of New York, No. 18 Civ. 11092 (the "Federal Action"), and filed a Notification of Removal in the NYS Supreme Court Action;

WHEREAS, on or about November 28, 2018, Plaintiff filed a Fourth Amended Complaint (Dkt. Nos. 2, 5, 6) in the Federal Action, which Plaintiff had filed in the NYS Supreme Court Action, adding Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman, and Paula Ashcraft as defendants (the "Fourth Amended Complaint");

WHEREAS, counsel for Defendants FBI, Roger Blank, Aaron Mino, Daniel Powell, Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman have appeared in the Federal Action;

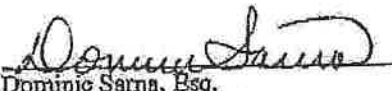
WHEREAS, no party hereto is an infant or incompetent person for whom a committee or guardian has been appointed;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, his counsel, and counsel for Defendants FBI, Roger Blank, Aaron Mino, Daniel Powell, Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman, that:


I. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff voluntarily dismisses the Federal Action with prejudice, which includes all underlying complaints filed in the NYS Supreme Court Action, with each party to bear its own fees and costs

2. This stipulation may be executed in counterparts, each of which constitutes an original and all of which constitutes one and the same agreement. Facsimiles of signatures shall constitute acceptable, binding signatures for purposes of this agreement.

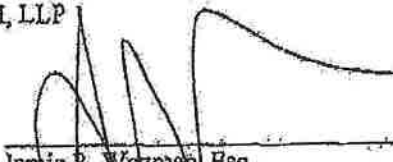
DOMINIC SARNA, ESQ.

By: 
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Attorneys for Plaintiff
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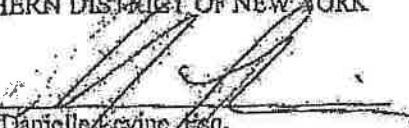
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By: 
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Attorneys for Defendants
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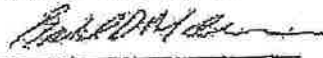
LEWIS BIRSBOIS BISGAARD &
SMITH, LLP

By: 
Jamie R. Wozman, Esq.
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I, Plaintiff Rahul Manchanda, have reviewed the Instant Stipulation of Dismissal with Prejudice and have had an opportunity to discuss the same with my attorney, Dominic Sarna. I agree to all language herein, including the agreements set forth in Paragraphs 1 and 2 of this Stipulation of Dismissal with Prejudice.


By: Plaintiff Rahul Manchanda

Sworn to before me this
25 day of January, 2019


Notary Public

DAVID HAMILTON
NOTARY PUBLIC-STATE OF NEW YORK
No. QTHA6362552
Qualified in Queens County
My Commission Expires 01-03-2021

SO ORDERED:


Honorable Paul G. Gardephe